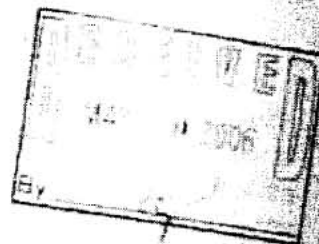


SANTA MONICA MOUNTAINS CONSERVANCY

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May 22, 2006

Mr. Ron Kosinski
Deputy District Director
Department of Transportation, District 7
100 South Main Street
Los Angeles, California 90012-3712



Additional Pre-Draft DEIS-DEIR Comments:
Interstate 405 HOV Lane Over the Sepulveda Pass (I-10 to US-101)

Dear Mr. Kosinski:

The Santa Monica Mountains Conservancy sent a letter dated May 3, 2006 to your attention regarding the above-referenced Caltrans project in the Sepulveda Pass. This letter addresses additional issues of concern to this agency.

Both the proposed new Getty Center Drive northbound on ramp and the Skirball Center Drive bridge reconstruction projects would require the permanent loss of Conservancy-owned parkland and permanent indirect impacts to adjacent parkland. As stated by Caltrans staff, some of these impacts will be addressed in a Federal Section 4(f) evaluation process. In addition, the Draft Environmental Impact Statement and Draft Environmental Impact Report (DEIS-DEIR) will analyze these impacts.

The DEIS-DEIR should also address the process and timing by which Caltrans would attempt to get control of the subject land now held the Santa Monica Mountains Conservancy-State of California.

Getty View Trailhead and Proposed North-bound On-ramp

We recommend that the alternatives section in the DEIS-DEIR include projects in which the Conservancy land is not available for the proposed northbound Getty Center Drive on ramp located north of Sepulveda Boulevard. That recommendation is partially driven by the obligations of the Conservancy and the Mountains Recreation and Conservation Authority (MRCA) to both the State and the Los Angeles County Regional Park and Open Space District to maintain the Getty View Trailhead in that location. That trailhead project was funded both by an FEMP grant administered by Caltrans and by Proposition A funds administered by the Los Angeles County Regional Park and Open Space District. The MRCA would be obligated to reimburse the Open Space District if the improvements

Attachment
Item 9(a)
SMMC
07-09-2007

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are removed. The proposed on ramp would obliterate the trailhead parking lot and more than half of the improved area. The DEIS-DEIR should thoroughly address the constraints and opportunities of moving this unique recreational facility to the southeast.

Justification for Enhanced Wildlife Crossing Structures and Capability

The proposed project will increase the width of the freeway a minimum of twelve feet through all sections of the Sepulveda Pass where wildlife crossing is feasible. As a result, the length of any existing wildlife crossing route will be longer, which is a detriment. Lighting, noise and other freeway related infrastructure will also produce a permanent expanded disturbance footprint into habitat all along the east side of the freeway. In the case of the Skirball Center Bridge, vehicle traffic capacity, and undoubtedly traffic volume, will further substantially diminish wildlife crossing capacity over that structure. In the case of the Getty Center on-ramp, the proposed project would add a major new constraint to a habitat linkage that already requires a surface crossing of Sepulveda Boulevard and a long diagonal crossing under the freeway. The proposed project cumulatively degrades both habitat linkages.

The commensurate mitigation for this potentially unavoidable significant impact must result in equal or better, permanent wildlife movement capacity across the 405 Freeway in the Santa Monica Mountains and a system that will endure future traffic system improvements. The proposed five-foot-wide sidewalk with no walls to buffer either street or freeway traffic noise on the Skirball Center Bridge does nothing to compensate for the above described set of project-induced adverse impacts.

Our May 3, 2006 letter calls for a ten-foot-wide combination sidewalk and wildlife crossing travel path with buffer walls and entry flares because that is the minimum combination of improvements that can consistently deliver an adequate number of wildlife crossings according to our senior biologist. These recommended specifications must take into account increased population density in the region and increased travel volumes over the Sepulveda Pass over the next 100 years. Both will continually erode wildlife crossing potential over time. Hence, a solution today must be designed to deliver an adequate level of function for decades to justify the public expense.

No empirical study has measured the increased wildlife movement potential of a ten versus five-foot-wide, traffic lane-adjacent sidewalk across one of the most busy freeways in the world. The professional judgement of biologists must be employed to determine the scale and configuration of a crossing structure that will maintain adequate wildlife crossing capability over time. It may be that an eight-foot-wide Skirball Center Bridge travel path with reduced buffer walls and entry flares may maintain a bobcat population east of the freeway for 20 years if no further transportation facilities are constructed in the Sepulveda

Pass. However, that reduction in the Conservancy's proposed dimensions and configuration may prohibit adequate deer movement. We urge Caltrans to design this bridge with adequate wildlife crossing capability rather than to look towards the lack of site specific empirical data to support a design with a minimum, to near nothing added, as far as mitigation weight.

The range of other evidence, combined with the public resources at stake, frame a picture that militates the importance of the Conservancy's requested mitigation. For example, Roth (2001) documents the pressure of a broad range of wildlife species to cross the freeway at the Sepulveda Boulevard, Bel Air Crest, Skirball Center and Mulholland Drive freeway crossing structures. A resurgence of bobcat sightings and numerous mountain lion sightings east of the 405 Freeway in the last five years further illuminate both the value and validity of maintaining such crossing structures.

Species crossings do not necessarily need to be frequent to maintain populations on the east side of the freeway. Most studies of wildlife crossing freeways have short sample periods with a low probability of capturing the number of animal travel events necessary to maintain minimum population viabilities. A good example was the recent Caltrans sponsored study along the 118 Freeway. No one is sure which of the existing crossings are best facilitating the movement of each species. No one is sure of future land uses either. However, it is sure that the proposed project will result in a potential unavoidable significant impact to wildlife movement across the 405 Freeway and as far east as Griffith Park. Because the Skirball Center Drive bridge is the shortest crossing distance that does not rely on the openness of any private land (Bel Air Crest), does not include any underpasses known to intimidate deer, and offers the only opportunity to provide a high quality dedicated safe travel path for wildlife, its mitigation potential should be maximized within reason.

Caltrans staff has presented less resistance to our staff about a potential high quality wildlife crossing under the proposed Getty Center Drive on-ramp through both the trailhead parking area and a unique sycamore riparian community that is a last vestige of the former Sepulveda Canyon riparian ecosystem. Assuming our staff's field input is accommodated into both the Caltrans preferred project and its DEIS-DEIR alternatives, we suspect that the foundations of a reasonable crossing system at this site will be presented for public review. Nonetheless, it cannot adequately mitigate the diminution of wildlife crossing ability where Sepulveda Boulevard crosses under the freeway. This provides additional justification to maximize the mitigation measures at the Skirball Center Drive bridge.

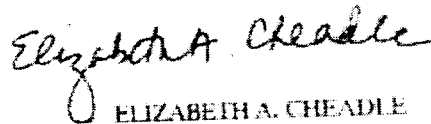
Neither the physical or biological constraints of the proposed project area nor the proposed wildlife crossing mitigation measures are simple or standard. We urge Caltrans to forge

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new ground on this important project and to build in the appropriate mitigation as dictated by science as opposed to standard construction regulations. As a society we get only one shot at this important juncture in the evolution of Southern California. We look forward to a ceremony dedicating a dedicated wildlife travel lane across the 405 Freeway, a bridge to the future that sweeps aside all mistakes of the past.

We respectfully request that all future documentation be sent to the attention of Paul Edelman, Deputy Director of Natural Resources and Planning, at the above address and that questions be directed to his attention at (310) 589-3200 ext. 128. We also request that this letter be included in the DEIS-DEIR.

Sincerely,



ELIZABETH A. CHEADLE
Chairperson